



Wisconsin  
Right to Life, Inc.

POLITICAL  
ACTION  
COMMITTEE

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COMMISSION  
MAIL ROOM

Mar 14 10 59 AM '95

March 9, 1994

Donald Averett  
Senior Reports Analyst  
Federal Election Commission  
Washington, DC 20463

Dear Mr. Averett,

Thank you for your assistance when I phoned yesterday about the Commission's letter to us asking us to clarify items that appeared on our 12 Day Pre-General and our 30 Day Post-General Reports. Specifically, the Commission asked us to clarify disbursements made to our connected organization (Wisconsin Right to Life, Inc.) for salaries.

In order to explain this, you suggested that I first explain our procedures for cutting salary checks just as I had explained it to you by phone. All employees of Wisconsin Right to Life, Inc. and Wisconsin Right to Life PAC have a weekly timesheet that must be filled out and submitted weekly. The timesheets have the various components of our organization listed (StatePAC, Federal PAC, WRL, Inc., Education Fund) and employees fill in the numbers of hours they spent working for a particular component of the organization. For example, I am both PAC Director and Legislative Director. When I am spending time on PAC activities, I record those hours under either State or Federal PAC, depending on which candidates are involved. For the time I spend on legislative matters, my time is recorded under WRL, Inc.

The individual who is responsible for submitting payroll information collects everyone's time sheets on a bi-weekly basis. She compiles the total number of hours spent on PAC activities and whether they are state or federal PAC hours. She then figures out what the State and Federal PACs must pay for salaries for that two week period. She then writes checks in those same amounts FROM THE PACS' CHECKING ACCOUNTS to Wisconsin Right to Life, Inc. to cover the cost of PAC salaries.

The actual salary checks that employees receive are prepared by Wisconsin Right to Life, Inc., our connected organization. When I receive my salary check, it is for the TOTAL hours I worked for election AND legislative activities. But PRIOR TO RECEIVING MY SALARY CHECK, the PAC has already paid the connected organization for the hours I spent on election activities. In effect,

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*Dedicated to protecting human life*

then, the connected organization is not spending funds for PAC salaries nor is the PAC reimbursing the connected organization for PAC salaries.

You also asked me to explain salary expenditures to our connected organization listed on Schedule D, "Debts and Obligations." You felt that those items gave the appearance of the connected organization initially paying PAC salaries with the PAC reimbursing the connected organization. After discussing this with you, I realize I have been incorrectly reporting this information on Schedule D.

The Schedule D requires that we list all incurred expenses for which we still owe all or part. After my conversation with you, I realize that I have been defining "incurred expense" more broadly than does the FEC. I have been instead using the definition required by our State Elections Board. Our SEB requires that we report as an incurred expense all activities started during a reporting period EVEN IF NO BILL HAS BEEN RECEIVED. The SEB asks that we estimate what we THINK the amount will be if we have not yet received a bill and report that as an incurred expense. In order to comply with the SEC I always give an estimate of what I think the salaries will be and to whom the salary check will go. Of course, Wisconsin Right to Life, Inc. would be the recipient of the check and that would be listed.

You explained to me that I should not be reporting those estimated expenses on Schedule D but only those incurred expenses for which we have received a bill. After hearing your explanation, it is clear to me why our Schedule D was so confusing. I do apologize for that. Please understand that my intention was to give you complete information and certainly not to withhold information. Unfortunately, I used our state's rationale instead of the FEC's.

Again, thank you so much for all of your help.

Sincerely,

*Susan Armacost*

Susan M. Armacost  
Assistan Treasurer

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